EXHIBIT "B"

UNITED STATES BANKRUPTCY COURT NORTHERN DISTRICT OF OHIO EASTERN DIVISION

In re:) Case No. 19-11235 (JPS)
)
ERIC MARCUS HENRY, SR.) Chapter 7
PAULETTE DEAN HENRY,)
) Judge Jessica E. Price Smith

AFFIDAVIT TO EMPLOY SPECIAL COUNSEL

Craig Bashein, being first duly sworn, deposes and states as follows:

- 1. He makes this Verified Statement pursuant to the provisions of Section 327(a) and (c) of the Bankruptcy Code regarding the employment of professional persons by the trustee, and in light of the restrictions and requirements imposed thereon by Rules 2014(a) and 5002 of the Federal Rules of Bankruptcy Procedure.
- 2. This Verified Statement supplements the disclosures contained in and accompanying the Motion of Trustee for Authority to Employ Special Counsel to Pursue a Personal Injury Claim on a Contingency Fee Basis (the "Motion").
- 3. This Verified Statement is to affirm to this Court that neither Affiant, nor any person with whom he is associated in the practice of law is a relative by blood or marriage of any Bankruptcy Judge of the Northern District of Ohio, and that he is not now nor has he ever been so connected with any such Judge as to render his appointment or the Court's approval of his employment as Attorney in the above-captioned matter improper.
- 4. This Verified Statement is to further affirm to this Court that neither Affiant, nor any person with whom he is associated in the practice of law, is connected with the debtors, creditors, or any other party in interest or their respective attorneys and accountants, the United States Trustee, or any person employed in the office of the United States Trustee, save for and except as set forth in the Motion.

5. Further, this Verified Statement is to fully disclose to the Court matters that might be considered by any party to create any issue or claim of conflict or lack of being a disinterested party, as relates to his law firm acting as counsel in this case; and to disclose to the Court that the only fees and expenses to be paid to Affiant shall be those allowed pursuant to order(s) of this Court, with none of such fees or expenses to be shared with third parties other than co-counsel, Frank T. Zobec.

Craig Bashein

SWORN TO BEFORE ME, and subscribed in my presence this ______ day of November, 2020.

Notary/Public

JANINE LYCAN
NOTARY PUBLIC • STATE OF OHIO
Recorded in Cuyahoga County
My commission expires May 19, 2022

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ERIC MARCUS HENRY, SR.)	Chapter 7
PAULETTE DEAN HENRY,)	•
)	Judge Jessica E. Price Smith

AFFIDAVIT TO EMPLOY SPECIAL COUNSEL

Frank T. Zobec, being first duly sworn, deposes and states as follows:

- 1. He makes this Verified Statement pursuant to the provisions of Section 327(a) and (c) of the Bankruptcy Code regarding the employment of professional persons by the trustee, and in light of the restrictions and requirements imposed thereon by Rules 2014(a) and 5002 of the Federal Rules of Bankruptcy Procedure.
- 2. This Verified Statement supplements the disclosures contained in and accompanying the Motion of Trustee for Authority to Employ Special Counsel to Pursue a Personal Injury Claim on a Contingency Fee Basis (the "Motion").
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- 4. This Verified Statement is to further affirm to this Court that neither Affiant, nor any person with whom he is associated in the practice of law, is connected with the debtors, creditors, or any other party in interest or their respective attorneys and accountants, the United States Trustee, or any person employed in the office of the United States Trustee, save for and except as set forth in the Motion.

5. Further, this Verified Statement is to fully disclose to the Court matters that might be considered by any party to create any issue or claim of conflict or lack of being a disinterested party, as relates to his law firm acting as counsel in this case; and to disclose to the Court that the only fees and expenses to be paid to Affiant shall be those allowed pursuant to order(s) of this Court, with none of such fees or expenses to be shared with third parties other than co-counsel, W. Craig Bashein.

Frank T. Zobec

SWORN TO BEFORE ME, and subscribed in my presence this 16 day of November, 2020.

Notary Public

GREGORY L. KORDIC, Attorney
NOTARY PUBLIC - STATE OF OHIO
My Commission has no expiration date
Section 147.03 R. C.